My name is Alan Davis and I've been a licensed ham radio enthusiast for 42 years. I've been involved in many aspects of ham radio over the years including homebrewing, restoring vintage radios, volunteer work and instructing at a Radio Camp for the disabled. I hold an Extra Class license.

I've experimented with high quality SSB (3.2kHz bandwidth) for the past 5 years and thoroughly enjoy it. This mode has brought many hams back into the hobby and hams worldwide are experimenting with it.

SSB is not a thing cast in stone, never to be changed! With DSP, we can build SSB exciters and receivers, who's performance was not even dreamed of when SSB was invented! To say that SSB was never intended to "sound good" or "shouldn't be changed" etc. is shallow and close-minded! Until now, SSB could never sound as good as AM and it can be done with half the bandwidth of AM. Experimenting with this mode has been going over 10 years with equipment that the FCC approved of. So there really isn't anything that new about high quality SSB!

I am against RM-10740 proposal! This is not the way to settle a turf dispute between special interest groups or reduce QRM! The two gentlemen who wrote the proposal evidently want the entire population of hams to narrow down their SSB & AM transmitters, because these two hams claim they were the recipients of QRM from ESSB emissions during "international radio contests". We all know that the 20 meter band e.g., is almost unusable by non-contesters during such contests – not because of a handful of 6kHz ESSB user's - , but because of the thousands of contester's who literally take over the band. These gentlemen can't be serious about who is taking up more room – if in fact they are claiming it is this tiny minority of 6 kHz ESSB users!

Attempting to scandalize the 6kHz ESSB users with pejorative statements such as:

" One group appears on the amateur bands during international radio contests, tweaking and adjusting their transmitters to splatter purposely, in order to provide themselves " elbowroom" during a contest on a very crowded band. "

" Another group has begun experimenting with transmitting " high-fidelity" audio, apparently seeking to simulate on the crowded **HF** radiotelephony bands the sound heard usually on the FM broadcast band."

" In the other cases mentioned in this Petition, overmodulation, intended and inintended, causes similarly wide signals to be transmitted."

IS NOT the way to settle this problem! ESSB users have the same right to exist on the hambands as the contester's do – provided such users follow the rules!

There is nothing illegal about sounding good and the fact that wideband audio is not desirable for contesting or weak signal work is obvious, but ISN'T the issue!

No one is suggesting that everybody should use 6kHz ESSB anywhere on the bands!
However, if we allow DSB AM which uses 6kHz to exist on our bands, how in good conscience can we reject 6kHz ESSB on the basis of excessive bandwidth usage? We don't have a law on the books that require that AM'er stay on one portion of the band. The AM'ers do this voluntarily and it works. Instead of prohibiting ESSB operation – and that is exactly what this proposal will do - why not allocate e.g., 10-15 kHz of the phoneband for 6kHz ESSB experimentation? Or, in view of the greatly reduced CW usage, put the ESSB subband in the CW subband just below the current phoneband?

As for the majority of HiFi SSB'ers (under 3.5kHz bandwidth) and AM user's of vintage equipment, such a restriction on voice bandwidth would impose an unfair financial burden on AM and SSB users, because of the expensive equipment necessary to ensure that existing transmitters are within the bandwidth specification. The practical effect of such a ruling would be to discourage the restoration of legacy AM transmitters, construction of homemade equipment and the experimentation with high quality audio gear. This unnecessary burden of accurately measuring spectrum bandwidth is both unnecessary and costly and should be rejected!

Furthermore this proposal states, " No ***amateur station transmission using J3E shall occupy more than 2.8 kHz bandwidth on any amateur frequency below 28.8 Mhz" .***

The proposal also declares, " As the Commission well knows, numerous serious scientific studies have established that voice communication wide enough to provide naturalness" is achievable using audio modulating frequencies of from 300 to 3,000 ***Hz.*** In practice many amateur SSB transmissions contain frequencies down to about 70 or 80 ***Hz*** and create no problems for adjacent stations."

The authors of the proposal, ADMIT that 70Hz to 3000Hz bandwidth does NOT create problems for adjacent stations and therefore contradict the necessity for this proposed ruling!

Limiting AF bandwidth does not address the underlying technical issue, spectrum usage or the RF footprint. We all have heard a 2.4kHz bw rig running too much RF clipping, overdriving an amplifier etc., that takes up 6kHz+! This proposed ruling would do nothing to alleviate this common problem, especially during "international radio contests"!

High quality SSB is about transmitting the cleanest, distortion-free RF signal and full-bodied audio possible for conversational use. It encourages the lost art of conversation or ragchewing. Manufacturers have produced transceivers over the past ten years, FCC approved, that produce 80 to 3100Hz, stock – as is. Transmit bandwidth is selectable on these radios, so narrow bandwidth has not been lost. Manufacturers of quality microphones, audio processing gear etc. have proliferated over the years - proving that many hams do like high quality audio. Clearly, we have come a long way from 2.1kc Collins bandwidth SSB, because we like the way 3kHz high quality SSB sounds.

Conclusion:

1. RM-10740 should be rejected! It is costly and creates more problems then it attempts to solve.
2. The FCC should legitimize the excellent results the 6kHz ESSB user's by allocating a 10 to 15kHz ESSB subband.
3. The FCC should locate, identify and fine those stations that intentionally interfered with established QSO's on 14.178MHz. Recordings available on request.

Sincerely yours,

Alan Davis, K2WS